

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

THE UNITED STATES OF AMERICA

v.

No. 19-cr-00251-LM

JOHNATHON IRISH

**ASSENTED-TO MOTION TO FURTHER EXTEND DEADLINE**

The defense respectfully requests an additional one-day extension of the deadline to file the defense sentencing memorandum and requests for departure or variance. The deadline was yesterday, October 5, 2020. The pleading was filed overnight. However, counsel was unable to file before midnight. Counsel apologizes for the delay and any inconvenience to the court or the government. Upon being notified of the foregoing, Assistant United States Attorney Anna Krasinski assented to this motion.

WHEREFORE the defense requests that the deadline for filing sentencing memoranda and requests for a departure or variance be extended to October 6, 2020.

Date: October 6, 2020

Respectfully submitted,

/s/ Richard Guerriero  
Richard Guerriero, Esq.  
N.H. Bar ID. 10530  
Lothstein Guerriero, PLLC  
Chamberlain Block Building  
39 Central Square, Suite 202  
Keene, NH 03431  
Telephone: (603) 352-5000  
richard@nhdefender.com

**CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the ECF system, will be sent electronically to registered Participants identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to the nonregistered participants on the date the document was signed by me.

*/s/ Richard Guerriero*